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Attorneys for Defendant
Mr. Garcia

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,) Case No. 2:23CR228-DJC
Plaintiff,)
vs.) STIPULATION AND ORDER TO CONTINUE
) JUDGMENT AND SENTENCING
EDGAR ENRIQUE GARCIA-LOPEZ,) Date: March 6, 2025
) Time: 9:00 a.m.
) Judge: Hon. Daniel J. Calabretta
<u>Defendant.</u>)

IT IS HEREBY STIPULATED and agreed by and between Acting United States Attorney Michele Beckwith, through Assistant United States Attorney Alstyn Bennett, counsel for Plaintiff, and Federal Defender Heather Williams, through Assistant Federal Defender Hootan Baigmohammadi, counsel for Defendant Edgar Enrique Garcia-Lopez, that the previously scheduled Judgment and Sentencing set for March 6, 2025 be continued to April 10, 2025 at 9:00 a.m.

The parties specifically stipulate as follows:

- On January 21, 2025, the Court continued Judgment and Sentencing at Mr. Garcia's request so that the government could extract data from his seized cellular phone (the phone was in the government's possession at the time, but no extraction had been completed) and allow him to review it for sentencing

mitigation purposes. Some of the data on the phone may be relevant to formal PSR objections.

2. The government did not complete the phone extraction prior to formal objections being due on February 20, 2025. They expect the extraction to be completed some time next week.

3. Good cause and compelling circumstances exist to continue the Judgment and Sentencing so that Mr. Garcia can have an opportunity to review the extraction prior to timely filing formal PSR objections.

4. The government does not object to Mr. Garcia's continuance request.

5. For the forgoing reasons, the parties jointly request that the Judgment and Sentencing Schedule be modified as follows.

Draft PSR	completed
Informal Objections	completed
Final PSR	completed
Formal Objections	March 27, 2025
Response to Formal Objections/Sentencing Memorandum	April 3, 2025
Judgment and Sentencing	April 10, 2025, at 9:00 AM

Respectfully submitted,

HEATHER E. WILLIAMS
Federal Defender

Date: February 21, 2025

/s/ Hootan Baigmohammadi
HOOTAN BAIGMOHAMMADI
Assistant Federal Defender
Attorneys for Defendant
Mr. Garcia

1 Date: February 21, 2025

MICHELE BECKWITH
Acting United States Attorney

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3 /s/ Alstyn Bennett
ALSTYN BENNETT
4 Assistant United States Attorney
Attorneys for Plaintiff
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ORDER

The Court, having received and considered the parties' stipulation, and good cause appearing therefrom, adopts the parties' stipulation in its entirety as its order.

IT IS SO ORDERED.

Dated: February 24, 2025

/s/ Daniel J. Calabretta

THE HONORABLE DANIEL J. CALABRETTA
UNITED STATES DISTRICT JUDGE